

United States District Court

NORTHERN DISTRICT OF CALIFORNIA

FILED
2005 FEB 18

RICHARD W. WHEATING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

V.

JOSE ISAIS-CABRERA (aka Borrego,
aka Pepe), and the defendants listed in
Attachment A hereto

CRIMINAL COMPLAINT

CASE NUMBER:

(Name and Address of Defendant)

3-05-7011

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about Sept., 2004 to Feb. 17, 2005 in San Francisco and elsewhere county, in the

Northern District of California defendant(s) did, (Track Statutory Language of Offense)
distribute and possess a controlled substance with the intent to distribute it, conspire to do so, and use a telephone to facilitate a drug crime

in violation of Title 21 United States Code, Section(s) 841(a)(1), 846 and 843(b) and 18 USC 1956

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following
Official Title

facts:

Attached affidavit incorporated by reference

Continued on the attached sheet and made a part hereof:

☒ Yes☐ No

Approved
As To
Form:

[Signature]
AUSA

[Signature]
Name/Signature of Complainant.

Sworn to before me and subscribed in my presence,

2-18-05

Date

at

San Francisco, California
City and State

Marla Elena James
United States Magistrate Judge

[Signature]
Signature of Judicial Officer

ATTACHMENT A

2. CARLOS AGUAYO (aka Lazarito, La Changa, Juan Last name Unknown [LNU])
3. MARIA GUADALUPE TORRES (aka Lupe)
4. SILVIA ROMERO (aka Rosa Martinez, Sylvia Martinez, Lupita Romero, Lupita)
5. PATRICIA SERRANO (aka Pati)
6. LUIS ALFONSO EL VIR
7. ROBERTO MORENO (aka Camaney)
8. RENE HERNANDEZ
9. OMAR QUINTERO CORNELIO
10. VERENICE VALENCIA PENA (aka Veri, Dori Dona)
11. AIDE SEGURA GARCIA

AFFIDAVIT OF MELANIE ADAMS

I, Melanie Adams, hereby declare as follows:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI). This affidavit is submitted in support of a criminal complaint charging JOSE ISAIS-CABRERA (aka Borrego, aka Pepe), MARIA GUADALUPE TORRES (aka Lupe), CARLOS AGUAYO (aka Lazarito, La Changa, Juan Last Name Unknown [LNU]), SILVIA ROMERO (aka Rosa Martinez, Sylvia Romero-Martinez, Lupita Romero, Lupita Martinez, Rosa Maria Martine), PATRICIA SERRANO (aka Pati), LUIS ALFONSO ELVIR, ROBERTO MORENO (aka Camaney), RENE HERNANDEZ, OMAR QUINTERO CORNELIO, VERENICE VALENCIA PENA (aka Veri, Dori Dona), AIDE SEGURA GARCIA, with a violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A), conspiracy to possess with intent to distribute and to distribute a Schedule I controlled substance, to wit: 11 kilograms or more of a mixture or substance containing a detectable amount of cocaine, and Title 18 United States Code, Section 1956 (h), did knowingly and intentionally conspire to conduct and agree together to conduct and attempt to conduct financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, the possession with intent to distribute and distribution of Cocaine, a violation of Title 21, United States Code, Section 841(a)(1), knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, and source of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity; Title 18 United State

Code, Section 1956(a)(1) Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves proceeds of specified unlawful activity - (B) knowing that the transaction is designed in whole or in part - (i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, and Title 18 United State Code, Section 1956(a)(2): Whoever transports, transmits, or transfers, or attempts to transport, transmit, or transfer a monetary instrument from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States - (B) knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission or transfer is designed in whole or in part - (i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

2. I have been an SA of the FBI for over three years. My training consisted of a 16-week FBI New Agents Class during which I received instruction on various aspects of federal narcotics investigations. In addition, to sixteen weeks of FBI New Agent Training, I have received 24 hours of training specifically regarding telephone analysis of cellular telephone and pagers as utilized by narcotics traffickers, an 80 hour Drug Enforcement Administration (DEA) Basic Drug Investigations training course, and 64 hours of Organized Crime Drug Enforcement Task Force training on money laundering and financial investigations. In my capacity as an FBI SA, I have participated in approximately ten investigations involving the distribution of illegal narcotics. Through these investigations, I and other law

enforcement personnel have utilized a variety of law enforcement techniques including confidential sources and undercover officers, physical surveillance, electronic surveillance, wiretaps, digital number recorders, telephone toll analysis, investigative interviews, search and arrest warrants, and the analysis of seized records, physical evidence and taped conversations. I have participated in the execution of over six federal and state search warrants. Prior to my employment as an FBI SA, I was employed by the FBI as an Intelligence Research Specialist for approximately nine years. In this capacity, I reviewed and analyzed criminal intelligence and investigative reports, seized records, telephone toll records, physical evidence and public source records and information from various databases. I assisted in the investigation of bank robberies, extortions, kidnaping, homicides and other violent crimes.

3. I am familiar with the facts and circumstances of this case as a result of my personal participation in this investigation, I have assisted as a co-case agent for the investigation into the narcotics trafficking activities of JOSE ISAIS-CABRERA and others. I have reviewed reports of investigation from the FBI, the DEA, the San Francisco Police Department (SFPD), Bureau of Narcotics Enforcement (BNE), Internal Revenue Service, Bureau of Immigration and Customs Enforcement (BICE), and I reviewed call sheets from the Title III interceptions which were all conducted in Spanish.

4. The following is a summary of the investigation and activities surrounding this conspiracy. On September 10, 2004, November 2, 2004, December 27, 2004, and January 19, 2005 court orders were signed by Honorable Maxine M. Chesney, United States District Court, Northern District of California authorizing wire interceptions and on January 21, 2005 a court order, signed by Honorable James Selna, United States District Judge, Central District of California, authorized the wire

interception of telephone 818-416-3512 used by SILVIA ROMERO . Pursuant to authority to conduct a wire investigation by the court and intercept the telephones of JOSE ISAIS-CABRERA (hereafter ISAIS-CABRERA), MARIA GUADALUPE TORRES (hereafter LUPE), and CARLOS AGUAYO (hereafter C. AGUAYO) and used of other investigative techniques, this investigation gathered evidence of the commissions of the abovementioned offenses. During the investigation and the wire interceptions, it was learned that JOSE ISAIS-CABRERA was a Bay area supplier of illegal narcotics, specifically cocaine, methamphetamine, heroin, and marijuana. ISAIS-CABRERA has direct contact with three suppliers of narcotics who are located in Mexico. ISAIS-CABRERA utilizes a transporter in Pacoima, California (Southern California) named SILVIA ROMERO (hereafter ROMERO) to transport narcotics from southern California to the Bay area and to courier bulk cash proceeds back to southern California to the suppliers in Mexico. ISAIS-CABRERA also utilizes his wife (hereafter LUPE) to maintain the accounts for the narcotics transactions and to wire money received as proceeds to Mexico. ISAIS-CABRERA's main narcotics runner is CARLOS AGUAYO (hereafter C. AGUAYO). C. AGUAYO sells the narcotics to customers such as ROBERTO MORENO (hereafter MORENO), RENE HERNANDEZ (hereafter HERNANDEZ), LUIS ALFONSO ELVIR (hereafter ELVIR), OMAR QUINTERO CORNELIO (hereafter OMAR), JOSE CAMPOS GARCIA (hereafter CAMPOS) and others. C. AGUAYO collects the proceeds from these narcotics transactions and both him and LUPE take money to AIDE SEGURA GARCIA (hereafter AIDE), VERENICE VALENCIA PENA (hereafter VERI) and others at Lobosa Western Wear to structure the money wired to Mexico as payment for the narcotics. PATRICIA SERRANO is a member of the ISAIS-CABRERA narcotics organization who facilitates obtaining apartment rentals

for stash locations, obtaining vehicles and also wiring money. The investigation has also revealed that from September 2004 through January 2005, ISAIS-CABRERA conspired with C. AGUAYO, LUPE, VERI and AIDE, an employee of LOBOSA, to launder the proceeds of their narcotics distribution operation that totaled in excess of \$64,650. LUPE, C. AGUAYO, VERI, AIDE and other unknown individuals, acting at the direction of ISAIS-CABRERA, wired proceeds from the sale of narcotics through LOBOSA in nominee names and in amounts less than \$3000 to Mexico to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds from the sale of narcotics. Additionally, the intercepted calls demonstrate that C. AGUAYO drops off cash, sometimes in excess of \$10,000 at one time, to AIDE at LOBOSA and she structures the wire transactions in numerous nominee names, in amounts under \$3,000, to reduce the amount of attention being drawn to the use of this amount of currency in the purchase of the wires.

5. On November 4, 2004 at approximately 3:29 p.m., C. AGUAYO used target telephone 415-335-8825 subscribed to Ricardo Murillo at 1140 Potrero, San Francisco, CA to receive an incoming call from an unknown male subsequently identified as ROBERTO MORENO who used telephone 415-730-9953 subscribed to Roberto Moreno at 3028 Moyers Road, San Pablo, CA. MORENO asked C. AGUAYO why the lady was not answering and C. AGUAYO replied he did not know. MORENO said he was going to be needing his candies and said, "I'm gonna need two of the good one, mine, the one I always get and one for that guy, you know." Later in the conversation, C. AGUAYO said, "So, you are going to get three." During the call, MORENO explained what he wanted and C. AGUAYO said he was in Oakland and then they agreed to meet around 6 or 7 p.m. that night. Later in the conversation, C. AGUAYO said he has the one that was cream and added that

it was the one that MORENO's friend liked. MORENO said, "But when you turn it to powder it gets shiny..." C. AGUAYO agreed to call MORENO back when he returns from Oakland. As this call was ending, C. AGUAYO received an incoming call waiting call from LUPE using telephone 415-846-3390 subscribed to Gerardo Garcia at 1624 Guerrero, San Francisco, CA. LUPE asked if C. AGUAYO recognized the number 730-9953. C. AGUAYO asked if someone had just called from that number. LUPE affirmed and said that nobody talked and she could only hear crazy music. C. AGUAYO said "Yeah, that is Camaney." LUPE said she did not want to answer. Later that night, C. AGUAYO and MORENO spoke and agreed to meet the next day to complete the transaction.

6. On November 4, 2004, at approximately 7:01 p.m., C. AGUAYO used target telephone 415-336-8825 to receive and incoming call from LUPE who used telephone 415-846-3390 subscribed to Gerardo Garcia at 1624 Guerrero, San Francisco, CA. During the conversation LUPE said ISAIS-CABRERA asked if C. AGUAYO could take LUPE everything (money derived from the sale of narcotics) that he had so that tomorrow C. AGUAYO could go "there" (Lobosa wire remitter) and send money to the woman. LUPE asked if it (the money derived from the sale of narcotics) was a lot (of money). C. AGUAYO affirmed.

7. On November 4, 2004, at approximately 7:21 p.m., there was another call between LUPE and C. AGUAYO concerning wire remittances (pen register data was not provided, so it is not known who initiated the call). During this call, LUPE informed C. AGUAYO that ISAIS-CABRERA told her that once C. AGUAYO saw the guy (to collect drug proceeds), he should call her so she could give C. AGUAYO ten (10) names for the lady and two for an unknown male (I believe this call demonstrates that C. AGUAYO was going to send the drug proceeds he was going to collect via remittance to

Mexico using LOBOSA. The names LUPE was going to provide C. AGUAYO would be the fictitious names for the receivers of the drug proceeds in Mexico. I further believe that the high number of names LUPE wanted to provide C. AGUAYO indicated that she was going to structure the payments to the lady to avoid any reporting requirements).

8. On November 5, 2005, at approximately 10:21 a.m., C. AGUAYO used target telephone 415-336-8825 to receive an incoming call from PATRICIA SERRANO (SERRANO) who used 415-334-0540 subscribed by Patricia Serrano at 375 Delano Avenue, San Francisco, CA. SERRANO asked C. AGUAYO to get her a card. C. AGUAYO asked what card. SERRANO replied a card to pay that bill for her female friend. Your affiant believes that LUPE had called SERRANO and asked her to add money to the pre-paid telephone account. At approximately 12:37 p.m., C. AGUAYO received an incoming call from PATRICIA SERRANO who used telephone 415-218-9812 subscribed to Ramon Serrano at 199 Sweeney Street, San Francisco, CA. SERRANO and C. AGUAYO talk about him not having lunch because he had been receiving a lot of calls (from narcotics customers). C. AGUAYO said he was not able to get the calling card at the store and he advised SERRANO that she could get it at any Sprint Store. SERRANO complained and said she did not think so since Sprint would ask her for information (about the phones).

9. On November 5, 2004, at approximately 2:39 p.m., C. AGUAYO used target telephone 415-336-8825 to receive an incoming call from MORENO at 415-730-9953. MORENO asked if C. AGUAYO could meet him at his old house on 16th where he used to live. MORENO said, "Bring me one morena and a sample so I can show it to the guy and another one for myself, that way I do not have to carry the whole thing. MORENO told C. AGUAYO he still owed C. AGUAYO two bills, but

would give them to him later today. At approximately 4:43 p.m., during another intercepted conversation, MORENO said he was on his way back and asked C. AGUAYO to have his two corners (½ kilogram of cocaine) ready and meet at the same place they met last time. MORENO said that one (1/4 kilogram of cocaine) is for him and one (1/4 kilogram of cocaine) is for the other dude (MORENO's customer). Later in the conversation, MORENO said he was going to go and call the other guy (MORENO's customer) and take it (1/4 kilogram) to him and "I'll get mine (1/4 kilogram) later, you can keep mine while I go and leave his." C. AGUAYO agreed. MORENO said he was leaving Richmond now and would call C. AGUAYO when he got on the bridge so they could arrive at the same time. At approximately 5:09 p.m., a conversation is intercepted during which MORENO told C. AGUAYO he was crossing the bridge.

10. At approximately 5:50 p.m., surveillance observed a green Nissan Altima with California License Plate (CALP) 3MHH619, previously identified as the vehicle driven by C. AGUAYO, arrive in the area of the 300 block of Utah Street in San Francisco, CA. The Nissan was observed pulling in behind a dark Chevrolet Caprice with CALP 2VSR841. Surveillance observed a Hispanic Male believed to be C. AGUAYO exit the Nissan and enter the passenger side of the Caprice. SFPD Officer Valdez observed an exchange between the two individuals. A short time later, C. AGUAYO exited the passenger side of the Caprice, re-entered the Nissan and both vehicles departed the area.

11. On November 5, 2004, at approximately 5:57 p.m., SFPD Officer Guerrero observed MORENO exit the Caprice and walk to the front entry of 1556 Howard, San Francisco, CA. SFPD Officers approached MORENO who reached for the inside of his jacket near his waistband. SFPD Officer Schaffer grabbed MORENO's hand preventing MORENO from continuing to reach in and

asked MORENO if he was reaching for a weapon to which MORENO replied, "No, it's coke."

Officer Schaffer reached into the jacket and removed a brown paper bag containing a plastic ziplock baggie with an amount of a white powdery substance. MORENO responded "it's not mine, I'm just a runner." An inventory search of the vehicle revealed paper indicia in the name of Roberto Moreno with addressed 3028 Moyers Road, San Pablo, CA and 1030 Grand Avenue, #3, San Francisco, CA.

MORENO was subsequently arrested by SFPD for violation of California Health and Safety Code Sections 11352 (Transportation, sale, giving away, etc., of designated controlled substances; punishment) and 11351 (Possession or purchase for sale of designated controlled substances; punishment). The evidence seized from MORENO tested positive for cocaine salt and weighed 249.1 grams.

12. Subsequent to the arrest of MORENO by SFPD, several conversations were intercepted. C. AGUAYO attempted to call MORENO several times and left messages for MORENO to call him. On November 5, 2004, at approximately 6:36 p.m., C. AGUAYO used target telephone 415-336-8825 to receive and incoming call from LUPE who used telephone 415-336-8063 subscribed to Guadalupe Vargas at 1140 Potrero Ave, San Francisco, CA. LUPE asked C. AGUAYO if it was done. C. AGUAYO said he had to leave because the guy (MORENO) did not answer. LUPE said JOSE (ISAIS-CABRERA) wanted to know how the black ones have worked. C. AGUAYO said 2 of 40 that he (ISAIS-CABRERA) had given him (C. AGUAYO) are gone. C. AGUAYO said, "The two 40 year old girls that he had left him are gone." C. AGUAYO said they still wanted something different, but the unknown male still took the last one today. LUPE asked C. AGUAYO if the unknown male is LUIS (LUIS ELVIR). C. AGUAYO said, yes. C. AGUAYO put

LUPE on hold because he had another call.

13. On November 5, 2004, at approximately 7:42 p.m., C. AGUAYO used target telephone to receive an incoming call from LUPE who used telephone 415-336-8063 subscribed to Guadalupe Vargas at 1140 Potrero Avenue, San Francisco, CA. During the conversation, LUPE asked C. AGUAYO if Camaney (MORENO) had called him back. C. AGUAYO said he (MORENO) did not call him back. LUPE said she just received a call from one of Camaney's (MORENO's) nieces¹ and she told her that Camaney (MORENO) was arrested and to be careful. LUPE told C. AGUAYO to watch his back. C. AGUAYO told LUPE how everything happened. During the conversation, C. AGUAYO explained how he met MORENO and saw vehicles following him and suspected something was wrong. C. AGUAYO said he never heard from Camaney (MORENO) after that. LUPE said to be careful, especially if they (law enforcement) saw his plates (license plates of his vehicle). C. AGUAYO said the license plates have a different address but it might be a problem still. LUPE said she was talking to RAQUEL and would tell Jose (ISAIS-CABRERA) to call. At one point in the conversation, C. AGUAYO said maybe he should talk to Jose (ISAIS-CABRERA) to see if he could switch cars.

14. On November 5, 2004 at approximately 8:29 p.m., C. AGUAYO used target telephone 415-336-8825 to make an outgoing call to SERRANO at 415-218-9812.² C. AGUAYO told

¹ The pen register on 415-336-8063 reflects an incoming call from 415-310-9346 subscribed to Roberto Moreno at 3028 Moyers Road, San Pablo, CA at approximately 7:42 p.m. on 11/05/2004.

² The pen register was not operational when this call was intercepted. However, the monitors recognized the voice of SERRANO and toll records reflect that 415-336-8825 made an outgoing call to 415-218-9812 on this date and time.

SERRANO he would not come to her house tonight because something happened today (arrest of MORENO) and he did not want to go there (SERRANO's house) tonight. SERRANO asked what happened and C. AGUAYO replied something happened to one of his friends (MORENO) and he could not tell her right now.

15. On November 5, 2004 at approximately 9:21 p.m., C. AGUAYO used target telephone 415-336-8825 to call ISAIS-CABRERA who used 415-336-9156.³ C. AGUAYO told ISAIS-CABRERA that RENE (a narcotics customer) just called and wanted four balls (possibly four ounces of heroin) but he told RENE to wait until tomorrow just to be safe...because of the car (C. AGUAYO's car was seen by law enforcement at the delivery of narcotics to MORENO). ISAIS-CABRERA instructed C. AGUAYO to wake up early and go look for a car. ISAIS-CABRERA told C. AGUAYO he wanted him to go to the cave (stash location) tomorrow at midday. ISAIS-CABRERA instructed C. AGUAYO he could go get the black car and use it for any errands but he should look for a car at the dealer, on the street, a used car or something. ISAIS-CABRERA told C. AGUAYO to call LUPE once he got a car.

16. At approximately 9:53 p.m., LUPE, using telephone 415-336-8063, called C. AGUAYO at target telephone 415-336-8825, and said that the two remittances that he sent over there, to the property (Mexico), did not have the pass codes. LUPE indicated that the missing pass codes (pin numbers assigned by LOBOSA and needed by the receivers in Mexico to pick-up the

³ The pen register was not operational when this call was intercepted. However, the monitors recognized the voice of ISAIS-CABRERA and toll records reflect that 415-336-8825 made an outgoing call to 415-336-9156 on this date and time.

money) were related to the remittances in the names of "Patricia" and "Ana Maria." C. AGUAYO replied that he would call (LOBOSA) tomorrow since they were closed for the moment.

17. On November 6, 2004 at approximately 9:10 a.m., C. AGUAYO used target telephone 415-336-8825 to receive an incoming call from LUPE who used 415-336-8063. LUPE wanted to know how things were looking. C. AGUAYO said everything looked good and he was looking for a car. LUPE said she was a little bit nervous. Later in the conversation, she said if something came up, he could come pick up the car. C. AGUAYO said he would give LUPE a call if something came up and in the meantime he would continue to look for a vehicle. LUPE told C. AGUAYO to take care of the phones (add money to the Sprint pre-paid phone accounts). C. AGUAYO said they do not open until 10:00 a.m. LUPE told C. AGUAYO to call the lady (AIDE) to check on the money (money wires) that was sent to Patricia's and Ana Maria's stuff. C. AGUAYO said he would call her later.

18. On November 6, 2004, at approximately 10:09 a.m, C. AGUAYO used target telephone 415-336-8825 to receive a call from MORENO using telephone 415-310-9346 subscribed to Roberto M. Moreno at 3028 Moyers Road, San Pablo, CA. MORENO said he got busted last night and he was talking on his brother's phone so there was "no problem." MORENO asked if C. AGUAYO thought he was being followed when he left. C. AGUAYO said he told MORENO that he saw a black Monte Carlo and a truck. MORENO asked if C AGUAYO thought MORENO was "dragging a tail" from there. The lengthy conversation discussed the vehicles seen and what C. AGUAYO and MORENO thought happened to get MORENO arrested. C. AGUAYO answered an incoming call waiting call from LUPE. LUPE said she spoke to the guy. C. AGUAYO said he was talking to the guy right now, that he posted bail and got out. LUPE said, "Listen, Juan, my phone is

disconnected." C. AGUAYO replied "Oh, it was? I'll go now to get them back." Your affiant believes that LUPE was asking C. AGUAYO to add money to the pre-paid telephones used by LUPE.

19. On November 6, 2004 at approximately 10:30 a.m., C. AGUAYO used target telephone 415-366-8825 to make an outgoing call to ISAIS-CABRERA who used target telephone 415-336-9156. C. AGUAYO told ISAIS-CABRERA that Camaney (MORENO) already got out and that he posted bail. ISAIS-CABRERA asked what he (MORENO) said. C. AGUAYO replied Camaney (MORENO) did not know whether it was his friend or if he was set up. C. AGUAYO indicated about eight cars arrived at once and the Monet Carlo that was seen earlier was also there. ISAIS-CABRERA and C. AGUAYO discuss the incident with MORENO at length. Later in the conversation, ISAIS-CABRERA and C. AGUAYO discuss brand of narcotics and whether they are running out. ISAIS-CABRERA said "...when you are running out call me so I can fix up more for you." ISAIS-CABRERA told C. AGUAYO to check around the cave (stash location) and see if it was clear (no law enforcement presence). C. AGUAYO told ISAIS-CABRERA that her (LUPE's) telephone is disconnected and he has to go pay it. ISAIS-CABRERA told C. AGUAYO to put some money into his (ISAIS-CABRERA's telephone) too.

20. On November 6, 2004, at approximately 11:01 a.m., C. AGUAYO used target telephone 415-336-8825 to call LUPE at telephone 415-336-8063 and asked for "Patricia's" full name. LUPE replied that it was "Patricia Madrigal Lua" and the other name was "Ana Maria Alvarez."

21. On November 6, 2004, at approximately 11:25 a.m., C. AGUAYO used target telephone 415-336-8825 to make an outgoing call to SERRANO at 415-281-9812 to ask for

directions. As he was hanging up, C. AGUAYO received an incoming call waiting call from SERRANO who used 415-261-2570 subscribed to Patricia Serrano at 372 Delano Avenue, San Francisco, CA. SERRANO asked C. AGUAYO if he had heard from Pepe (ISAIS-CABRERA). SERRANO indicated that they were trying to contact the woman (LUPE) but she was not answering the phone. C. AGUAYO asked "Who?" and SERRANO said "Lupe." C. AGUAYO asked where LUPE was at. SERRANO said the guy (ISAIS-CABRERA) just called her⁴ asking what's going on. SERRANO said she called target telephone 336-9156 but Pepe (ISAIS-CABRERA) had that one (phone). SERRANO said she did not have the other number. C. AGUAYO gave her the number 336-8063.

22. On November 6, 2004, at approximately 11:42 a.m., C. AGUAYO used target telephone 415-336-8825 to make an outgoing call to LUPE who used telephone 415-336-8063 subscribed to Guadalupe Vargas at 1140 Potrero, San Francisco, CA. During the conversation, C. AGUAYO gave LUPE the pin number so that "Patricia (or the receiver of the drug proceeds in Mexico who was using the fictitious name of Patricia) could obtain the money. One pin was 11885578086 (Patricia's) and the other was 11885578094 (Ana's). LUPE said she was going to call them so that they could cash the money. Internal Revenue Service (IRS) Agents participating in this investigation, confirmed that these transactions were sent via VIGO REMITTANCE CORP by Lobosa Graphics and Photography at 4132 Monterey Road, San Jose, California. (See Appendix A)

⁴ The pen register on 415-336-9156 used by JOSE ISAIS-CABRERA reflects an incoming call on 11/06/2004 at approximately 11:15 a.m. and an outgoing call at approximately 11:16 a.m. to 415-261-2570 subscribed to Patricia Serrano at 375 Delano Avenue, San Francisco, CA. Telephone 415-336-9156 was roaming in Mexico on this date.

23. On November 8, 2004, at approximately 10:32 a.m., C. AGUAYO used target telephone 415-366-8825 to receive an incoming call from SERRANO who used 415-218-9812. SERRANO said that someone called back about the car. C. AGUAYO asked which one. SERRANO said it was a '95 Jetta, 5 speed, 91,000 miles for \$3, 800. SERRANO said she was going to see it today. They discuss that the vehicle is in San Rafael. C. AGUAYO said it was too far away. SERRANO replied, "So what? You need a car, so you should tell them that you have to run an errand, tell them not to bother you right now." SERRANO told C. AGUAYO that she already said she would go (see about the car) and he could give her the money and she would go get it. Throughout the day, there were numerous calls intercepted between SERRANO and C. AGUAYO in which SERRANO discusses the vehicles she was looking at for C. AGUAYO.

24. On November 8, 2004, at approximately 3:56 p.m., C. AGUAYO used target telephone 415-336-8825 to receive a call from HERNANDEZ who used telephone number 415-726-2564 subscribed to Rene Hernandez at 346 Alemany Boulevard #1, San Francisco, CA. During the conversation, HERNANDEZ asked in coded language what the price of a corner would be. I believe HERNANDEZ is referring to a quarter kilogram of cocaine. C. AGUAYO replied that one would be 4. After some negotiating, C. AGUAYO agreed to provide HERNANDEZ a corner (1/4 kilograms of cocaine) for 39 (\$3, 900). Based on my training and experience in narcotics investigations, the average price for a quarter kilogram of cocaine varies but in this investigation a quarter kilogram ranges from approximately \$3,800.00 to approximately \$4,000.00. Also, in this investigation the code "corner" was defined as 1/4 kilograms of cocaine when MORENO was arrested with approximately a 1/4 kilogram of cocaine after ordering one corner from C. AGUAYO.

25. On November 10, 2004, at approximately 9:17 a.m., C. AGUAYO used target telephone 415-336-8825 to receive an incoming call from SERRANO who used telephone 415-218-9812. SERRANO asked C. AGUAYO if he was going to take the car to the smog place because it was open. At approximately 11:31 a.m., C. AGUAYO used target telephone 415-366-8825 to make an outgoing call to SERRANO at 415-218-9812. C. AGUAYO asked SERRANO under what name she wanted it. SERRANO said under Yvette Arriola.

26. On November 11, 2004, at approximately 10:08 p.m., C. AGUAYO used target telephone 415-336-8825 to make an outgoing call to LUPE who used telephone 415-846-3390. During the conversation, LUPE said, "I just wanted to tell you that I am about to call Jose (ISAIS-CABRERA) and I am gonna tell him that I gave you "that" (money) already." C. AGUAYO agreed. LUPE said, "So if he calls you and asks you, you tell him that I gave you the amount of six remittances for \$15,500." C. AGUAYO acknowledged. IRS Agents participating in this investigation, confirmed that these transactions were sent via VIGO REMITTANCE CORP by Lobosa Graphics and Photography at 4132 Monterey Road, San Jose, California. (See Appendix A)

27. On November 12, 2004, at approximately 1:15 p.m., DEA Agents and SFPD narcotics officers established surveillance in the area of 22nd Street and Folsom Street in regards to an unknown male named PEDRO LNU placing a narcotics order with C. AGUAYO. During this surveillance SFPD Officer Rick Guerrero observed C. AGUAYO arrive in the area operating a tan colored Volkswagen Jetta bearing CALP 3NOF389.⁵

⁵ A California Department of Motor Vehicle records check showed CALP 3NOF389 registered to a 1995 Volkswagen registered to Yvette Arriola at 131 Russia Avenue, Apt 2, San

28. On November 12, 2004 at approximately 1:53 p.m., C. AGUAYO used target telephone 415-366-8825 to receive and incoming call from SERRANO at 415-218-9812. C. AGUAYO told SERRANO that he was in San Francisco driving and that he was busy now. SERRANO said she was at DMV (Department of Motor Vehicles). Later, at approximately 2:17 p.m., C. AGUAYO used target telephone 415-366-8825 to receive an incoming call from SERRANO at 415-218-9812. SERRANO said "Done, and you don't have to go back to show the insurance because he said that I had a very pretty smile and he did not believe that I would drive without...and SERRANO laughed. SERRANO said she paid 230 and C. AGUAYO owed the money to SERRANO. SERRANO said "Taxes." C. AGUAYO said, "Wasn't it supposed to be a gift?" C. AGUAYO asked what price SERRANO gave and she paid \$2000. C. AGUAYO affirmed and asked "'Unintelligible' the registration." SERRANO said "Yvette Arriola" and then she said, "I'm gonna send the pink slip to her house. I was going to send it to my house, but it would be the same as putting it under my name, so I sent it to her house. Once she gets it, I'll get it from her." Your affiant believes that SERRANO facilitated C. AGUAYO in purchasing and registering a new vehicle under another person's name in order to avoid detection and identification by law enforcement. SERRANO did not put the vehicle under her name in order to avoid law enforcement tracing the vehicle to her.

29. On November 13, 2004, at approximately 1:11 p.m., HERNANDEZ, used telephone number 415-726-2564 to call C. AGUAYO at target telephone 415-336-8825. HERNANDEZ stated that he needed a corner (1/4 kilogram of cocaine). C. AGUAYO asked HERNANDEZ if he

Francisco, California.

needed a "michoacana" (a half). HERNANDEZ stated that no, he only needed a corner. C. AGUAYO stated that he would make the delivery in fifteen minutes.

30. On November 13, 2005, at approximately 8:06 p.m., C. AGUAYO used target telephone 415-336-8825 to receive an incoming call from ISAIS-CABRERA. During this intercepted telephone call C. AGUAYO told ISAIS-CABRERA things are going. C. AGUAYO told ISAIS-CABRERA he had the other car, it's a Jetta, it's almost new. C. AGUAYO went on to say it's a '95 and he got it for 3-8 (\$3,800) and since it belonged to a white guy C. AGUAYO would place it under PATI's (SERRANO) female cousins name in case of...that the name C. AGUAYO used.

31. On November 19, 2004, at approximately 2: 26 p.m., LUPE, used target telephone 415-846-3390 to contact C. AGUAYO at target telephone 415-336-8825. During this conversation, LUPE indicated that "VIEJILLA (the old lady - a narcotics source of supply for the ISAIS-CABRERA narcotics organization)" was calling to ask for at least one "envio (remittance for partial payment of narcotics). LUPE further indicated that she "...just came here (a store that sends wire remittances somewhere near her home in Daly City, CA) (to see) the girls and they said that the one who supposedly did the favors was fired (an employee from an unknown remittance store who would facilitate the laundering of narcotics proceeds by providing fictitious names and structuring wire transfers for LUPE). LUPE then asked C. AGUAYO if he knew anyone who could "hook us up with a remittance" and C. AGUAYO replied, "no, nobody here, only there (LOBOSA in San Jose, CA). LUPE said that "VIEJILLA" would have to wait until Monday because it is not worth it to go over there for only one (travel to LOBOSA in San Jose for only one remittance). C. AGUAYO told LUPE that she should tell "VIEJILLA" that it is very hard to wire from here, that you have to know a person

who would do that favor and that it is about a two hour drive from here and that you can't...because you are busy and you waste time. (This call demonstrates that members of the ISAIS-CABRERA narcotics organization, to include C. AGUAYO and LUPE, realize the restrictions law enforcement and financial institutions, to include wire transmittal businesses, have placed to help thwart the laundering of drug proceeds. I believe this call also demonstrates that they have a "friend" or employee at LOBOSA who facilitates the laundering of their drug proceeds through wire remittances to Mexico.)

32. On November 24, 2004, at approximately 10:46 a.m., C. AGUAYO, used target telephone 415-336-8825 to contact 408-393-5216 and spoke with a woman he identified as DONA DORI. DONA DORI asked C. AGUAYO if he was calling her regarding the codes (pin numbers for wire remittances) and C. AGUAYO affirmed. DONA DORI said that she would give them to her in a few minutes and that she would call him back. (I believe DONA DORI is Verenice VALENCIA, the owner of LOBOSA, for the following reasons. According to Sprint Spectrum LP, the subscriber for 408-393-5216 is Verenice V. Pena, SSN 570-90-9260, DOB 03-23-1970, and contact number 408-229-9051 (LOBOSA's telephone number. A Choice Point commercial data base query indicated that 570-90-9260 is assigned to Verenice Valencia Pena. Also, in later intercepted telephone calls with 408-229-9051, the female caller identified herself as "Veri". According to the wire monitors, DONA DORI and Veri are the same person. Hereinafter, DONA DORI or Veri will be referred as Verenice VALENCIA) At approximately 11:04 a.m., VERI using 408-393-5216, called C. AGUAYO at 415-336-8825. C. AGUAYO asked if VERI had them already (the pin numbers for the wire remittances so he can inform the receivers of the laundered funds in Mexico) and VERI said that she would have AIDE give the pin numbers to him.

33. On November 24, 2004, at approximately 11:06 a.m., C. AGUAYO received a call from an unknown female (AIDE) at 408-229-9418 who asked if C. AGUAYO had been waiting for the code. C. AGUAYO affirmed and AIDE provided the following information: Gabriel Alaniz sent to Ricardo Ramirez Rodriguez code: 11460893583; Jose Israel Diaz sent to Rosa Elvia Gracian 11616274300; Rosalba Chavarria sent to Oscar Garcia 11627480375. AIDE then gave C. AGUAYO her new telephone number as 408-460-9827⁶. Your affiant believes this call demonstrates that AIDE and VERI are facilitating the money laundering activities of the ISAIS-CABRERA Narcotics Organization by providing fictitious names and structuring the wire remittances in order to avoid scrutiny by law enforcement and by Vigo Remittance Corporation compliance department.) After C. AGUAYO spoke with AIDE and received the names and the pin numbers, he called LUPE a couple of times at target telephone 415-846-3390 and provided her with the names and pin numbers for the wire remittances (so LUPE could inform the narcotics source of supply in Mexico for the money pick-up). IRS Agents participating in this investigation, confirmed that these transactions were sent via VIGO REMITTANCE CORP by Lobosa Graphics and Photography at 4132 Monterey Road, San Jose, California. (See Appendix A)

34. On November 30, 2004, at approximately 10:40 a.m., C. AGUAYO used target telephone 415-366-8825 to contact VERI who used telephone 408-393-5216. She said that she was the lady from the store (LOBOSA) and asked if he was going to go there that week. C. AGUAYO informed VERI that he was heading there at that time. VERI said, "oh, that's good" and C. AGUAYO

⁶ According to Sprint Spectrum LP, Aide SEGURA-Garcia, with an address of 4132 Monterey Road, San Jose, CA {LOBOSA's address} is the subscriber to this number.

said that he only needed nine remittances. VERI replied that it didn't matter and that it was fine. C. AGUAYO then said that he was just about to head out (go to LOBOSA) and VERI said that it would give her time to get all the paperwork ready.

35. On December 1, 2004, at approximately 9:55 a.m., VERI, using telephone 408-393-5216, called C. AGUAYO at target telephone 415-336-8825 and informed him that she was working on the remittances and that she would call him when she was done (VALENCIA was preparing the paperwork in advance of C. AGUAYO visiting LOBOSA and when LOBOSA was still not open to the public, which doesn't seem like a normal business practice. I believe this indicates that she is attempting to conceal the true origins.)

36. On December 1, 2004, at approximately 10:28 a.m., C. AGUAYO used target telephone 415-336-8825 to make contact VERI who used telephone 408-393-5216 subscribed to Verence V. Pena at 2587 Story Road, San Jose, CA. At approximately 10:28 a.m., C. AGUAYO, using target telephone 415-336-8825, called VERI at 408-393-5216. VERI told C. AGUAYO that she was working on it (preparing the falsified paperwork for the remittance) when he called her, but that she has it now. VERI then informed C. AGUAYO the names of the senders and receivers, the passwords (pin numbers) and the amount being sent (in Pesos). Specifically, VERI said that one of them was Edgardo Betancourt Moreno, 2,100 (U.S. dollars being sent) and the password as 11887306122. C. AGUAYO then asked who was sending it (the fictitious name of the sender) and VERI replied that it was being sent by Jose Humberto Arias Ortiz. C. AGUAYO asked how much (the amount of the remittance) and VERI replied, it is 2,000, so he will receive 23,163 Mexican pesos. VERI continued by saying that the next person was Patricia Madrigal Alua and the person who was

sending it from here was Francisco J. Gomez. VERI further said that the password was 11887311726. C. AGUAYO asked, How much was she going to receive? And VERI replied, 28,678 (pesos). VERI then said that Cecilia Torres was next and the sender was Juan H. Diaz Juarez., password 11887311734 and that he would receive 28,678 (pesos). VERI then thanked Juanito (C. AGUAYO) and told him to keep in touch and that she would be waiting to hear from him next week. IRS Agents participating in this investigation, confirmed that these transactions were sent via VIGO REMITTANCE CORP by Lobosa Graphics and Photography at 4132 Monterey Road, San Jose, California. (See Appendix A)

37. On December 29, 2004, at approximately 10:20 a.m., ISAIS-CABRERA used target Telephone 415-336-9156 to make an outgoing call to C. AGUAYO at telephone 415-336-8825. During the conversation, ISAIS-CABRERA told C. AGUAYO that he wanted him to go to San Jose as soon as he (C. AGUAYO) finished his breakfast, and C. AGUAYO agreed. ISAIS-CABRERA said he had some money that he needed C. AGUAYO to send in two or three remittances (to keep the threshold below the \$10,000 reporting requirement). C. AGUAYO said he would go when he was finished eating and that he would call when he got there. ISAIS-CABRERA told C. AGUAYO to write down the names now because he (ISAIS-CABRERA) was going to see the guy in Oakland, the one with the licenses, (fraudulent Driver's licenses). C. AGUAYO asked for the names and ISAIS-CABRERA answered Ramon Martinez Martinez, Jose Antonio Martinez Razo to Aasolo, Guanajuato. ISAIS-CABRERA then asked C. AGUAYO how many he had there and wanted to know if C. AGUAYO had two more (possibly a reference to names that would be used for remittances). C. AGUAYO said he had seven of them. ISAIS-CABRERA told C. AGUAYO to put another one in for

"the old lady", the four of them and one for "the old lady". C. AGUAYO asked where the Ramon Martinez Martinez one was to go and ISAIS-CABRERA replied, to Abasolo, Guanajuato (in Mexico). C. AGUAYO asked if both of them (the wire remittances) should be sent to Abasolo and ISAIS-CABRERA agreed. ISAIS-CABRERA then added that if C. AGUAYO had (money) for another two (wire remittances), he could give C. AGUAYO more names (fictitious names for the remittances). ISAIS-CABRERA said Antonio Morales Catalan to Guerrero. ISAIS-CABRERA further said that if C. AGUAYO had more (money) left over, he could send it to Maria De Jesus. C. AGUAYO stopped ISAIS-CABRERA and told him he only had "seven bucks (\$7,000)". ISAIS-CABRERA agreed and said that the three of them would do then. C. AGUAYO asked ISAIS-CABRERA how he wanted him to "Divvy (divide) it (the money) up". ISAIS-CABRERA said he could send "2500 (\$2,500) each" and C. AGUAYO agreed. ISAIS-CABRERA told C. AGUAYO to be sure to call him and that he was going to DMV. (This call indicates that ISAIS-CABRERA directs his courier, C. AGUAYO to take money received in payment for narcotics transactions and launder the money by wiring the money in false names).

38. On December 29, 2004, at approximately 1:44 p.m., C. AGUAYO told ISAIS-CABRERA that the lady (AIDE at LOBOSA) wants to hold one until tomorrow (further evidence that AIDE is structuring {concealing the origins} of the wire remittances). ISAIS-CABRERA then told C. AGUAYO to tell her (AIDE) to do the ones to Abasolo today and the one to Guerrero tomorrow and C. AGUAYO agreed. ISAIS-CABRERA further told C. AGUAYO to have the lady do it early tomorrow. C. AGUAYO then put AIDE on the phone. AIDE asked when she would see ISAIS-CABRERA and he said that he'll be there (LOBOSA) in a few days. AIDE also said that VERI

wasn't there right now, but that VERI told AIDE that one (remittance) had to be left for tomorrow (in order to further conceal the remittances). ISAIS-CABRERA then told AIDE to make sure that two (wire remittances) went to Abasolo, Guanajuato (Mexico) and one (wire remittance) to Guerrero (Mexico) tomorrow.

39. On December 29, 2004, at approximately 5:35 p.m., C. AGUAYO used telephone 415-577-4086 to call ISAIS-CABRERA at target telephone 415-336-9156 and asked if he should give ISAIS-CABRERA the codes or the receipts (from the wire remittances sent that day at LOBOSA). ISAIS-CABRERA said that he doesn't really care. C. AGUAYO said that he would give ISAIS-CABRERA the codes. C. AGUAYO said that one was Ramon Martinez from Victor Mendoza Farias, the code was 11889837660, and that the amount was two and a half (\$2500), and in local currency 27750 (Pesos). C. AGUAYO then said the other one was for Jose Antonio Martinez Razo from Pedro Perez Gonzalez, code 11889838361, and that it was for the same amount (\$2500 or 27750 Pesos). ISAIS-CABRERA then asked if the other one was still to be done (the wire remittance that VERI instructed AIDE not to send until the next day). C. AGUAYO affirmed and added that is the one for Antonio Morales Catalan. C. AGUAYO further said that it would be sent tomorrow at around 10:15 a.m. or 10:20 a.m., since the place (LOBOSA) opened at 10:00 a.m., and that it was for 2 ½ as well (\$2500). C. AGUAYO indicated that he would call the place (LOBOSA) tomorrow at 10:15 a.m. and that it (the wire remittance) was supposed to be ready then. ISAIS-CABRERA asked if C. AGUAYO had a new code (pin number for the remittance) and C. AGUAYO said that he would not have it until tomorrow.

40. On December 30, 2004, at approximately 11:21 p.m., AIDE, using telephone 408-460-

9827, called C. AGUAYO at target telephone 415-336-8825 and asked C. AGUAYO to write down the following numbers. AIDE then repeated "3935216 (pin code)" and C. AGUAYO confirmed. At approximately 12:01 p.m., VERI, using telephone 408-393-5216, called C. AGUAYO at target telephone 415-336-8825 and confirmed the remittance was for Antonio Morales Catalan from Luis G. Pardo Hernandez and gave the number as 11889906598. VERI confirmed that it went out and was for \$2500, which converts to 27,625 in Mexican Pesos. IRS Agents participating in this investigation, confirmed that these transactions were sent via VIGO REMITTANCE CORP by Lobosa Graphics and Photography at 4132 Monterey Road, San Jose, California. (See Appendix A).

41. On January 4, 2005, at approximately 11:40 a.m., ISAIS-CABRERA, using target telephone 415-336-9156 called AIDE at 408-460-9827 and asked if she was already working (at LOBOSA) and AIDE replied that she was on her way. ISAIS-CABRERA said that he would be at AIDE's (LOBOSA) in about 30-40 minutes and added that he would need her to set apart some names (so he could wire remit drug proceeds to Mexico). AIDE said okay.

42. On January 4, 2005, at approximately 5:18 p.m., ISAIS-CABRERA received an incoming call from an unknown female (UF) believed to be the daughter of the "Old Lady". The UF said, "I am the lady's daughter". ISAIS-CABRERA told the UF to hold on while he found the numbers to give her. ISAIS-CABRERA said, "This one is Prospera Fuenza Alarcon, right?" The UF agreed and ISAIS-CABRERA continued, "And is being sent by Rodrigo Estrada Diaz and the code is 11890360223." ISAIS-CABRERA then said, "You are going to receive 29,665.75 (pesos) and also... Maria de Jesus Alvarez Chavez, right?" The UF agreed. ISAIS-CABRERA then said, "The code is... the one sending is Rosalva Chavarria Solos." The UF agreed and ISAIS-CABRERA asked

her if she knew who was sending the other one. The UF replied, "The name of who is sending you don't have to give me. Only..." ISAIS-CABRERA cut her off and said okay, "The one is for Maria de Jesus Alvarez Chavez.... the code is 11890360215...and is going to receive 29,943 (pesos) and tell your mom that those are the only ones the girl (AIDE) gave me because her boss was around". (This call demonstrates that ISAIS-CABRERA is structuring money wire transfers which are proceeds from narcotics sales to Mexico in fraudulent names and that the recipient of the money wires will be the Old Lady. The call also demonstrates that the recipients are keeping track of the amounts sent in order to figure out how much is still owned. I know that narcotics are often fronted to dealers such as ISAIS-CABRERA and then the accounts are reconciled at a later date. I also believe that the reference he makes of not being able to wire more money to the "old lady" because the "girl (AIDE's)" boss (VERI) was around was told to buy more time in paying his narcotics source of supply. Previous calls have demonstrated that VERI is complicit in facilitating the laundering of the ISAIS-CABRERA organization's narcotics proceeds through LOBOSA.)

43. On January 4, 2004, at approximately 9:03 p.m., ISAIS-CABRERA used target telephone 415-846-3390 to receive an incoming call from RAQUEL at an unknown Mexican telephone number. During the conversation, ISAIS-CABRERA indicated to RAQUEL to write down the numbers and information he was going to give her, to pay attention to what he would say to avoid problems with the code numbers. Then after she took notes of what he said, she was to call the people and "let them know". ISAIS-CABRERA said, "The remittance for Jaime Vasquez from Cosme Fernandez Pacheco. He's going to collect the amount of 29,943 (pesos) and the code number is 11890395781." ISAIS-CABRERA dictated another remittance that was from Alfredo Cisneros

Gutierrez to RAQUEL. "Cisneros is going to get 28,834 (pesos) and the code is 11890385063."

Another remittance for "Ana Maria Alvarez which is from Abel Corona Nederos for the amount of 29,388.50 (pesos) and the code number is 11890374778, Edgar going from Antonio Piza Jacobo for the amount of 29,943 and the code number is 11890362997, Magdalena Berber Tamayo from Adrian Aguayo Ruano for the amount of 29,111.25 and the code number is 11890360256, Marielena Birrueta Barajas from Jose Antonio Valencia for the amount of 28,834." (At this point, ISAIS-CABRERA's cell phone rang and he was talking on both phones at the same time.) ISAIS-CABRERA told PALOMAS that a remittance for Gilberto Contreras Ramirez was ready from Isidro Cortez Robles for the amount of 27,725 and the code number was 11890360207. RAQUEL said out loud 203 (\$203,000). ISAIS-CABRERA told RAQUEL to do the numbers with PALOMAS tomorrow, to be clever because that was what made the money move. RAQUEL affirmed. ISAIS-CABRERA said, "A remittance for Marielena Birrueta Barajas from Jose Antonio Valencia for the amount of 28,834 and the code number is 11890360249, Antonio Lopez Garcia from Jose Agustin Reyes Corona for the amount of 29,943 and the code number is 11890360231". ISAIS-CABRERA asked her how many remittances she received. RAQUEL said "seven". ISAIS-CABRERA told RAQUEL to do the math from "that" also, because ISAIS-CABRERA had to do his own balances over here and repeated to RAQUEL to get together with PALOMAS to do the numbers. He wanted her to keep a record of what was happening there. RAQUEL said she was doing just that, keeping note of the number of calves and the kilos (possibly kilograms of cocaine). ISAIS-CABRERA wanted to know if RAYMUNDO would bring some more this week (narcotics). RAQUEL affirmed and said that RAYMUNDO told her he had another portion. "The thing is he was very demanding with the money

and RAYMUNDO called RAQUEL about five times a day.” ISAIS-CABRERA told RAQUEL she could give him a call and let him know that she got a hold of those (possibly the money) that way he would be ready tomorrow. (I believe that ISAIS-CABRERA structures money wire transfers, which are proceeds from narcotics transactions, to RAQUEL in Mexico. RAQUEL then collects the money and uses the money to pay debts incurred for narcotics fronted to ISAIS-CABRERA). IRS Agents participating in this investigation, confirmed that these transactions were sent via VIGO REMITTANCE CORP by Lobosa Graphics and Photography at 4132 Monterey Road, San Jose, California. (See Appendix A).

44. On January 15, 2004 at approximately 9:43 a.m., ISAIS-CABRERA used target telephone 415-336-9156 to receive a call from C. AGUAYO who used telephone 415-577-4086. C. AGUAYO gave JESUS ISAIS-CABRERA the names and codes. C. AGUAYO said, “sender Gilberto Diaz Leal to Olivia Almazan Arcos, 27,825.50 in local currency, code 11890857020, from Tomas Sanchez Pineda to Jose Manuel Arcos Castorena, same amount, code 11890857012.” JESUS ISAIS-CABRERA instructed C. AGUAYO to send a 100 or 200 pesos extra next time so that the remittances look different. IRS Agents participating in this investigation, confirmed that these transactions were sent via VIGO REMITTANCE CORP by Lobosa Graphics and Photography at 4132 Monterey Road, San Jose, California. (See Appendix A).

45. On January 19, 2005 at approximately 6:40 p.m., ISAIS-CABRERA received a call on target telephone 415-336-9156 from TONO. LUPE, ISAIS-CABRERA’s wife, answered the telephone. TONO said Juan A. Arroyo-Arredondo. LUPE affirmed and said the code # is 11891403022, “For the amount of 28,730 (pesos)”. TONO asked if the first name LUPE gave him

was Antonio Piza or if it was Piso? LUPE confirmed Piza. LUPE indicated to TONO to repeat the last 2 code numbers she gave to him. TONO said, "Antonio Piza code # 11891401745." LUPE agreed and said that one is for \$2,400.00 US dollars. TONO acknowledged and said, "The one for Juan Arroyo code # is 11891403022." LUPE affirmed and said, "That's for 2,600 same as here (US Dollars)." LUPE passed the phone to ISAIS-CABRERA. ISAIS-CABRERA indicated that with these remittances it'll be a total of "5", one for 2,400 and the other one for 2,600. TONO acknowledged and indicated to ISAIS-CABRERA that "The man" will get across (possibly across the border) and that he would be there around where ISAIS-CABRERA was going to be, between 2:00 and 3:00 P.M. He stated, "That the man will go there personally and get it from ISAIS-CABRERA. IRS Agents participating in this investigation, confirmed that these transactions were sent via VIGO REMITTANCE CORP by Lobosa Graphics and Photography at 4132 Monterey Road, San Jose, California. (See Appendix A).

46. On January 23, 2005, at approximately 12:41 p.m., HERNANDEZ, used telephone number 415-726-2564 to call C. AGUAYO at target telephone 415-577-4086. HERNANDEZ asked C. AGUAYO for a "michoacana." C. AGUAYO stated that he would be at HERNANDEZ' house in twenty minutes. In response to this intercepted conversation, agents established surveillance at 346 Alemany Boulevard, San Francisco, California, which was believed to be HERNANDEZ' residence.

47. On January 23, 2005, at approximately 1:00 p.m, agents observed a truck, registered

to HERNANDEZ, CALP 6T90430⁷, parked near the residence at 346 Alemany Boulevard. At approximately 1:13 p.m., C. AGUAYO, using Target Telephone 415-336-8825, called HERNANDEZ at 415-726-2564 and told HERNANDEZ that he was here. Agents observed C. AGUAYO in his previously identified vehicle, a champagne-colored Volkswagen Jetta, CALP 3NOF389, driving westbound on Alemany Boulevard. At approximately 1:14 p.m., agents observed HERNANDEZ exit his residence, run to C. AGUAYO's vehicle, and enter the passenger side. At approximately 1:20 p.m., agents observed HERNANDEZ exit C. AGUAYO's vehicle and return to the residence at 346 Alemany Boulevard. C. AGUAYO drove away. Agents noted that HERNANDEZ' jacket was sagging visibly on the left side, and there appeared to be something heavy in the left jacket pocket. The agents described this as a noticeable change from HERNANDEZ' previous appearance, before HERNANDEZ entered C. AGUAYO's vehicle.

48. Agents maintained surveillance at 346 Alemany Boulevard. At approximately 1:39 p.m., a woman, later identified as SALLY MELENDEZ, exited the residence at 346 Alemany Boulevard. HERNANDEZ exited the residence moments later. HERNANDEZ entered the driver's side of his truck, and MELENDEZ entered the passenger side. The truck drove away. Agents followed the vehicle to a bus zone, and MELENDEZ exited the vehicle at approximately 1:51 p.m. MELENDEZ was wearing black clothes and an orange safety vest, and she joined a group of individuals that were also wearing orange safety vests. Agents followed HERNANDEZ as he drove southbound on Mason Street, then westbound on Turk Street. HERNANDEZ double parked on Turk

⁷ This vehicle is a silver colored 2002 Toyota truck registered to Rene Hernandez at 346 Alemany Blvd, San Francisco, California.

Street. At approximately 1:55 p.m., agents observed MELENDEZ walking southbound on Mason Street, then westbound on Turk Street. MELENDEZ entered a 2000 Acura, California license plate 5BKV949. HERNANDEZ, who was double parked next to the Acura, backed up his vehicle, and MELENDEZ drove into traffic. Agents followed, and observed HERNANDEZ following MELENDEZ as they drove away. HERNANDEZ and MELENDEZ eventually split up, after HERNANDEZ stopped at a red light. Agents continued to follow HERNANDEZ, who later stopped in front of a residence at 1781 Geneva Avenue.

49. On January 23, 2005, at approximately 2:19 p.m., an unknown Hispanic male (UHM) exited 1781 Geneva and met with HERNANDEZ. Agents observed that HERNANDEZ' vehicle was parked behind MELENDEZ' vehicle. HERNANDEZ met briefly with the UHM, then HERNANDEZ entered the passenger side of MELENDEZ' vehicle. MELENDEZ' vehicle drove away. The UHM returned to the residence at 1781 Geneva.

50. Agents followed MELENDEZ' vehicle through city streets. At Brazil Street and Naples Street, MELENDEZ did not come to a complete stop. MELENDEZ was stopped for this traffic violation, and MELENDEZ identified herself with her drivers license. HERNANDEZ was the only other individual in the vehicle. MELENDEZ was given a warning and allowed to drive away. Agents followed the vehicle to 346 Alemany Boulevard, where the vehicle parked. HERNANDEZ and MELENDEZ entered the residence at 346 Alemany Boulevard, and surveillance was terminated.

51. On February 5, 2005 at approximately 12:25 p.m., C. AGUAYO used target telephone 415-577-4086 to receive an incoming call from LUIS ALFONSO ELVIR (hereafter ELVIR) who used telephone 415-577-3354 subscribed to Andres A. Gonzales at 3032 Minna Avenue, Oakland,

California. During the conversation, ELVIR said to C. AGUAYO he needed "fifteen clowns" (15 ounces of heroin) in San Francisco." C. AGUAYO informed ELVIR that he is far away. LUIS said "That it's no problem" and to call him when he was back in the area. Based on my training and experience in narcotics investigations and this investigation, your affiant believes that "clowns" are a code for heroin and that ELVIR ordered 15 ounces of heroin from C. AGUAYO in this call.

52. On February 5, 2005 at approximately 2:05 p.m., C. AGUAYO used target telephone 415-577-4086 to call ELVIR who used telephone 415-577-3354. During the conversation, C. AGUAYO said he was back at the house. ELVIR asked C. AGUAYO "to bring twenty clowns over to the apartment." C. AGUAYO agreed and said he would call ELVIR once he was closer.

53. On February 5, 2005, at approximately 2:20 p.m., Task Force Officers (TFOs) Carl Bonner and Kevin O'Malley initiated surveillance in the vicinity of 7000 MacArthur Boulevard, 3032 Minna Avenue, and 2215 86th Street, Oakland, California.

54. On February 5, 2005, at approximately 4:40 p.m., TFO Carl Bonner observed four Hispanic males enter a white 1990 Toyota 4-Runner bearing Oregon licence plate 144BMW.⁸ TFOs O'Malley and Bonner followed the vehicle and observed it stop in front of 7000 MacArthur Boulevard. TFO Bonner observed the four Hispanic males exit the vehicle and enter the apartment complex at 7000 MacArthur Boulevard. TFO O'Malley observed a champagne colored Volkswagen Jetta bearing CALP 3NOF389, previously identified as C. AGUAYO's vehicle park west of the apartment complex.

⁸ This vehicle is a white colored Toyota 4 Runner registered to Luis Elvir Arteaga at 23725 Stanley Street, Wood Village, Oregon, 97060. Luis Elvir Arteaga is a known alias for Luis Elvir.

55. On February 5, 2005, at approximately 4:55 p.m., TFOs Bonner and O'Malley observed an unidentified Hispanic male exit the apartment complex located at 7000 MacArthur Boulevard and enter the white 1990 Toyota 4-Runner, CALP 144BMW. TFOs Bonner and O'Malley followed the vehicle to 2215 86th Avenue, Oakland California. TFO's Bonner and O'Malley observed the unidentified Hispanic enter the front door of 2215 86th Avenue. At approximately 5:25 p.m., TFO Bonner observed a grey 2000 Volkswagen Beatle bearing Washington license plate 863TBU⁹, park in front of 2215 86th Avenue, Oakland, California. TFO Bonner identified this individual as ELVIR. TFO Bonner observed ELVIR use a key to enter the front door of 2215 86th Avenue. At approximately 5:40 p.m., TFO Bonner observed ELVIR exit 2215 86th Avenue, enter the grey 2000 Volkswagen Beatle and drive west on 86th Street.

56. On Monday, February 7, 2005, at approximately 11:56 a.m., JOSE ISAIS-CABRERA used Target Telephone 415-577-4086 to call TOCAYO at 415-336-2651. During the conversation, ISAIS-CABRERA told TOCAYO that he was going down there (the Southern California area) tomorrow morning.

57. On Tuesday, February 8, 2005, at approximately 11:36 a.m., ISAIS-CABRERA used Target Telephone 415-336-9156, to call SILVIA ROMERO at Target Telephone 818-416-3512. During the conversation, ISAIS-CABRERA told ROMERO that he was on his way.

58. On February 8, 2005, at approximately 5:15 p.m., DEA surveillance units observed ISAIS-CABRERA arrive and park in front of 12227 Osborne Place, Apartment #154, Pacoima,

⁹ This vehicle is 2000 Volkswagen Beetle registered to Javier A. Cabrera Arteaga at 1207 NW 92nd Street, Apt #108, Seattle, WA.

California, the residence of ROMERO. ISAIS-CABRERA was driving a 1999 dark blue Volkswagen Passat, California license plate 4HSU978. ISAIS-CABRERA entered the residence without knocking. Several minutes later, surveillance units observed ISAIS-CABRERA and ROMERO come out of the apartment, take several duffel-type bags out of the vehicle and carry them into the apartment.

59. On February 9, 2005, at approximately 8:48 p.m., C. AGUAYO used target telephone 415-577-4086 to receive an incoming call from OMAR QUINTERO CORNELIO (hereafter OMAR), who used telephone number 408-219-2669 subscribed to Martha Chavez at 230 Orespimba Circle, Tracy, CA. During the conversation, OMAR told C. AGUAYO that he (OMAR) spoke to the guy that he (OMAR) told C. AGUAYO about. OMAR asked C. AGUAYO to come over to where OMAR was located around 1:00 p.m. or 1:30 p.m. tomorrow. OMAR told C. AGUAYO that he (OMAR) would be stopping by to pick up the "paper" (money) around 12:00 p.m. and for C. AGUAYO to be there at 1:00 p.m. C. AGUAYO asked OMAR if he wanted C. AGUAYO to bring him the same "food" (illegal narcotics). OMAR affirmed by saying "the very same one". The telephone conversation continued with both individuals confirming the 1:00 p.m. meeting time.

60. On February 9, 2005, at approximately 11:00 a.m., ISAIS-CABRERA received an incoming call on Target Telephone 818-416-3512, from an unknown male, believed to be ABEL ISAIS-CABRERA, using telephone number 714-585-3947. During the call, ABEL asked ISAIS-CABRERA if his phone was working. ISAIS-CABRERA told ABEL that his service was cut off. ABEL then asked ISAIS-CABRERA if he was coming over his way. ISAIS-CABRERA told ABEL that he was going to organize some paper in the car, that he just brought the bunch of papers without organizing them. ABEL asked ISAIS-CABRERA if it would take him two hours to get there. ISAIS-

CABRERA acknowledged and added that he would call ABEL before he left. The ABEL told ISAIS-CABRERA that he was with the load right now. ABEL then added that the load was already bought and he would be waiting for ISAIS- CABRERA later.

61. On February 9, 2005, at approximately 2:39 p.m., ISAIS-CABRERA used Target Telephone 818-416-3512, to call an unknown female, believed to be GUERA, at 818-339-1605. During the conversation, ISAIS-CABRERA told GUERA to have "that one" give him a call. ISAIS-CABRERA added that he was very close to her (GUERA). GUERA asked ISAIS-CABRERA who he ("that one") was and ISAIS-CABRERA responded "TOCAYO." GUERA told ISAIS-CABRERA that she might not be able to reach TOCAYO and if something came up to call the other one, the "Big Man." ISAIS-CABRERA acknowledged and told GUERA to call him back. GUERA acknowledged and asked ISAIS-CABRERA for his number. ISAIS-CABRERA told GUERA to call him at 415-336-9156. GUERA acknowledged and ISAIS-CABRERA asked GUERA to give him a call one way or the other.

62. On February 9, 2005, at approximately 3:30 p.m., DEA surveillance units in the vicinity of ROMERO's apartment, observed ISAIS-CABRERA come out of the residence, place a bag in the Passat and leave. At approximately the same time, surveillance units observed ROMERO come out of the residence, place a bag in a 1998, green Ford F-150 pick-up truck, California license plate 6G15098 and leave. Intercepted telephone calls on Target Telephone 818-416-3512 indicated that ROMERO was en route to deliver money to LA GUERA, who was previously identified as a money launderer for this drug trafficking organization. At approximately 3:45 p.m., DEA surveillance units followed ROMERO to 11111 Stagg Street, Sun Valley, California. ROMERO was observed going

into the residence carrying a large shoulder bag. ROMERO left the residence approximately five minutes later.

63. On February 9, 2005, at approximately 3:58 p.m., ROMERO used Target Telephone 818-416-3512 to call ISAIS-CABRERA at Target Telephone 415-336-9156. During the conversation, ROMERO told ISAIS-CABRERA that she saw GUERA. ISAIS-CABRERA acknowledged and told ROMERO that "the man" that was suppose to receive "that" (the money) would not be coming until Monday. ISAIS-CABRERA added that "the man" told him to save "it" (the money). During the remainder of the conversation, ISAIS-CABRERA and ROMERO discussed where to leave "it" (the money). ISAIS-CABRERA told ROMERO that he would probably have to keep "it" (the money) at her residence.

64. On February 9, 2005, at approximately 5:15 p.m., surveillance units followed ISAIS-CABRERA, who was driving the Volkswagen Passat, to the Village Apartments, 541 N. Tustin Avenue, Santa Ana, California. Surveillance units believed that ABEL resided at the Village Apartments. At approximately 6:30 p.m., a 1985 white Audi, California license plate 4WWE680 arrived and parked next to ISAIS-CABRERA's Volkswagen Passat. At approximately 9:25 p.m., three unidentified individuals came out of the Village Apartments and went to the vehicles. Two individuals entered the Volkswagen Passat and one entered the Audi. The vehicles followed in tandem to Ochoa's Place, 1411 E. First Street, Santa Ana, California.

65. On February 10, 2005, at approximately 1:42 p.m., C. AGUAYO used target telephone 415-577-4086 to place an outgoing call to OMAR, who used telephone number 408-219-2669. During the conversation, C. AGUAYO told OMAR that he (C. AGUAYO) was there. OMAR told

C. AGUAYO to come up for the next day.

66. On Thursday, February 10, 2005, at approximately 1:10 a.m., two individuals entered the Volkswagen Passat and the vehicle departed Ochoa's Place. The Passat was followed to the Village Apartments, where one passenger got out of the vehicle and went inside. The Passat left the Village Apartments to northbound 5 freeway where surveillance was discontinued.

67. On February 10, 2005, at approximately 1:45 p.m., surveillance observed C. AGUAYO driving a champagne colored Volkswagen Jetta, CALP 3NOF389 in the vicinity of and parking in the parking lot of 2025 Beatrice Court, San Jose, California. C. AGUAYO was observed exiting this vehicle, obtaining a brown paper bag from the back seat area, and walking toward the back stairway, which provides access to apartment 6 (2025 Beatrice Court, Apt. 6, San Jose, California is the residence for OMAR QUINTERO CORNELIO). Approximately five (5) minutes later, C. AGUAYO was observed walking back to his vehicle from the direction of the back stairway, carrying a brown paper bag. At approximately 2:10 p.m., surveillance observed an individual later identified as OMAR QUINTERO CORNELIO, walking toward a tan Nissan pickup, California license plate number 5L42645¹⁰, which OMAR had previously been seen driving. OMAR was observed entering the pickup and driving away from the area. A review of surveillance photographs indicate that OMAR was concealing a rectangular object in the front of his jacket. Your affiant believes the outline of the object concealed in OMAR's jacket appeared to have the same shape as a packaged kilogram quantity of cocaine.

¹⁰ This vehicle is tan colored Nissan pick-up registered to Martha Teresa Chavez or Omar Quintero at 2025 Beatrice Court Apt 6, San Jose, CA.

68. On February 14, 2005, at approximately 2:12 p.m., ISAIS-CABRERA used target telephone 415-336-9156 to receive an incoming call from LUPE who used target telephone 415-336-8063. LUPE said she went to the shop (stash location) already and also noted down all that was there. ISAIS-CABRERA asked if LUPE was inside (of the stash location). LUPE said no, she was at home already. ISAIS-CABRERA asked LUPE if she "weighed everything that's there." LUPE affirmed but explained there were two left over in the drawers and there was no "scale" to weigh them (illegal narcotics). ISAIS-CABRERA said he weighed those already. ISAIS-CABRERA asked if there was a note that he wrote down in the notebook (records kept of amount of narcotics, customers, and money paid and received).¹¹ LUPE affirmed. ISAIS-CABRERA asked LUPE to bring that note with her. LUPE asked if she should leave that other (possibly money) as it is because she did not have anything to (bring/wrap) it in. ISAIS-CABRERA affirmed and said it was 3 (amount of money) and some change. ISAIS-CABRERA told LUPE to bring that note with her. LUPE acknowledged.

69. On February 14, 2005, at approximately 3:03 p.m., LUPE used target telephone 415-8063 to make an outgoing call to ISAIS-CABRERA who used target telephone 415-336-9156. LUPE told ISAIS-CABRERA that TOCAYO (later identified as Jose CAMPOS GARCIA, hereafter CAMPOS) had called looking for him. ISAIS-CABRERA asked which TOCAYO and LUPE replied TOCAYO with a lazy voice. At approximately 3:11 p.m., LUPE called ISAIS-CABRERA again and told him she has the number (for TOCAYO). ISAIS-CABRERA replied he already spoke to

¹¹ Your affiant knows from training and experience that narcotics traffickers keep books, records, and papers of recorded information about the amounts of illegal narcotics customers receive and the amount of money paid or owed.

TOCAYO. At approximately 3:33 p.m., LUPE who used target telephone 415-336-9156 was in the process of making an outgoing call when an incoming call waiting call was received from TOCAYO (CAMPOS) who used telephone 305-356-0531. LUPE answered. CAMPOS asked for ISAIS-CABRERA and LUPE placed him n the phone. CAMPOS said "I'm ready. That guy wanted to go to the thing that spins up there, the Hyatt in downtown but it's closed. I told him to wait until 6:00 p.m." ISAIS-CABRERA said he would call the guy (C. AGUAYO) right now.

70. On February 14, 2005 at approximately 4:23 p.m., C. AGUAYO used target telephone 415-577-4086 to make an outgoing call to TOCAYO (CAMPOS) who used telephone 415-336-2651. C. AGUAYO said he was at the shop (stash house) now and asked if he was supposed to only take him a "rim." CAMPOS said it is supposed to be a "diego" (ten kilograms of cocaine). C. AGUAYO said, "Oh, a diego." CAMPOS replied "Yes, a diego." C. AGUAYO replied, "Oh, ten rims, alright" and said he would be there in about 15 minutes.

71. On February 14, 2005, at approximately 4:38 p.m., TFO Fee observed C. AGUAYO driving a 1995 Volkswagen Jetta with CALP 3NOF389 on eastbound on Silver Avenue. At approximately 4:43 p.m., TFO Fee observed C. AGUAYO travel southbound Dartmouth Avenue. His vehicle was observed parking on the northwest corner of Bowdoin and Felton Avenues. At approximately 4:48 p.m., Officer observed a black Chevrolet pickup with CALP 3KRG027 travel westbound on Felton Avenue. The truck parked on the northeast corner of Bowdoin and Felton Avenues. At approximately 5:50 p.m., C. AGUAYO was observed exiting his vehicle and walking toward CAMPOS. C. AGUAYO was carrying a large 2x3 multi-colored plastic bag. The bag appeared to be weighted down with several heavy objects inside. C. AGUAYO was observed

opening the passenger side door of CAMPOS' vehicle and placing the plastic bag on the passenger floorboard area. CAMPOS and C. AGUAYO were observed speaking to each other and then C. AGUAYO left, walked to his vehicle, and drove away. At approximately 4:55 p.m., Officer observed CAMPOS drive away.

72. On February 14, 2005, at approximately 5:00 p.m., SFPD stopped a Chevrolet Silverado Pickup with CALP 3KRG027¹² for failing to stop at a stop sign. SFPD Officers asked the driver, who was later identified as Jose Campos Garcia (CAMPOS), for his driver's license. Officers noticed that CAMPOS' hand were shaking and he was looking in his rear view mirror several times. Due to the length of time it was taking CAMPOS to locate his license and his nervousness, Officers asked him to exit the vehicle. Officers patted CAMPOS down for weapons. CAMPOS provided his driver's license. Officers asked CAMPOS if he had any weapons or narcotics in his vehicle and if Officers could search his vehicle. CAMPOS said "No." Officers believed CAMPOS may have concealed a weapon or contraband and told CAMPOS they were going to search the area where CAMPOS was observed leaning. Officers unfolded the tops part of a Disneyland bag and looked inside. Officers observed approximately ten (10) green wrapped rectangular shaped objects in the bag. The search of CAMPOS revealed a cellular telephone and \$7,672.00 in United States currency. SFPD recovered approximately ten kilograms of suspected cocaine from inside the multi-colored bag and one suspected kilogram cocaine from the rear passenger door. A presumptive test was conducted and the test revealed a positive result for the identification of cocaine. Additional testing will be

¹² This vehicle is a 2005 Chevrolet Silverado registered to Jack R. Bowen at 770 Cherry Court, Brentwood, CA.

conducted by the DEA Western Regional Laboratory.

73. On Monday, February 14, 2005, at approximately 8:46 p.m., ISAIS-CABRERA received an incoming call on Target Telephone 415-336-9156 from TONO, who was calling from Mexico. During the conversation, ISAIS-CABRERA told TONO that by tomorrow or a day after, he (ISAIS-CABRERA) was going to send "that" (the money) to him.

74. On February 16, 2005, at approximately 9:37 a.m., ISAIS-CABRERA received an incoming call on Target Telephone 415-336-9156 from ROMERO, who was using Target Telephone 818-416-3512. During the conversation, ROMERO told ISAIS-CABRERA that a guy named PONCHO called her and said that he was sending somebody to pick up the check that ISAIS-CABRERA had left there. ISAIS-CABRERA responded that it was okay and asked ROMERO when he was coming to see her. ROMERO told ISAIS-CABRERA that the guy was sending his son sometime between 1:00 and 2:00. ISAIS-CABRERA asked ROMERO if the guy calling was PONCHO. ROMERO replied that it was PONCHO and she asked ISAIS-CABRERA if it was okay. ISAIS-CABRERA told ROMERO that it was okay and he (ISAIS-CABRERA) was going to call down there right now.

75. At approximately 9:38 a.m., ISAIS-CABRERA used Target Telephone 415-336-9156 to call telephone number 453-5154120 in Apatzingan, Mexico. During the conversation, ISAIS-CABRERA told RAQUEL to call TONO and tell TONO to call him (ISAIS-CABRERA). RAQUEL told ISAIS-CABRERA that she would call him (TONO) right away.

76. At approximately 10:03 a.m., ISAIS-CABRERA received an incoming call on Target Telephone 415-336-9156 from TONO, who was calling from Mexico. ISAIS-CABRERA told

TONO that ROMERO had called him (ISAIS-CABRERA) and said that a guy named PONCHO called her and told her that his son was going to come by and he (ISAIS -CABRERA) asked TONO if this was okay. TONO told ISAIS-CABRERA that this was okay.

77. Based on conversations intercepted in San Francisco, California, and Santa Ana, California, surveillance, at approximately 11:30 a.m., surveillance was established at ROMERO's residence.

78. At approximately 1:11 p.m., ROMERO received an incoming call on Target Telephone 818-416-3512 from PONCHO, who was using telephone number 818-294-9000. During the conversation, PONCHO told ROMERO that his son was by the 101 Freeway close to Universal Studios. PONCHO told ROMERO that his son was a delivery and he would meet with her when he was done. PONCHO asked ROMERO if there was a lot of paper and ROMERO replied that there were five that were medium sized. PONCHO said that his son did not have a lot of room to store them. ROMERO said that she had to go home to organize them better. PONCHO asked ROMERO if she could do that because he (PONCHO's son) would have to put them in the trunk of his car. ROMERO acknowledged and PONCHO told her that he was going to have his son call her.

79. At approximately 1:37 p.m., ROMERO received an incoming call on Target Telephone 818-416-3512, from a person identifying himself as PONCHO's son, who was using telephone number 619-664-3668. The individual using telephone number 619-664-3668, who identified himself to ROMERO as PONCHO's son, was later identified during a car stop as ALFONSO BENITEZ-Olivas (hereinafter BENITEZ). During the conversation, ROMERO told him to take the 5 Freeway north, get off at Osborne, make a right and there would be a Target, Payless and a gas station. ROMERO told

BENITEZ to call her when he arrived and wait for her by the Target and it would only take her three minutes to get there. BENITEZ acknowledged and added that he would call her when he got there.

80. At approximately 1:47 p.m., ROMERO received an incoming call on Target Telephone 818-416-3512, from BENITEZ, who was using telephone number 619-664-3668. BENITEZ told ROMERO that he was by Target. ROMERO told BENITEZ that she was driving a green truck and would be there shortly. BENITEZ told ROMERO that he was going to park by the store.

81. At approximately 1:50 p.m., surveillance observed ROMERO leaving her residence carrying a light-colored bag with a red logo. ROMERO reached through the open passenger side window of her vehicle and placed the bag on the passenger side floorboard.

82. At approximately 1:56 p.m., ROMERO received an incoming call on Target Telephone 818-416-3512 from BENITEZ, who was using telephone number 619-664-3668. BENITEZ asked ROMERO if she had arrived. ROMERO told BENITEZ that she had to pass two more lights. BENITEZ told ROMERO that he was driving a cherry-colored car. ROMERO told BENITEZ that she was going to drive through the main Target entrance.

83. At approximately 1:58 p.m., ROMERO was seen driving into the Target parking lot. ROMERO drove southbound in the lot and was soon followed by a red Chevrolet Malibu. At approximately 1:59 p.m., ROMERO, using Target Telephone 818-416-3512, called BENITEZ at 619-664-3668 and told her that he saw her and was right behind her. Surveillance observed ROMERO and BENITEZ drive in tandem to the Food For Less parking lot, where they parked next to each other. BENITEZ got out of his car, waived his hands and walked over to ROMERO's vehicle. BENITEZ took a bag from ROMERO and returned to his vehicle. Both ROMERO and BENITEZ

then left the parking lot. ROMERO was followed back to her residence where she backed into a parking space and sat in the vehicle for approximately 15 minutes. ROMERO got out of her car and walked into her residence. The red Malibu was followed for approximately one mile by surveillance agents a Los Angeles Police Department (LAPD) marked patrol vehicle. While the vehicle was being followed, the driver went through a red light. He was stopped by a marked LAPD patrol unit. The LAPD patrol officer determined that the driver was driving without a valid California drivers license. The driver, ALFONSO BENITEZ-Olivas, was arrested and the vehicle was impounded.

84. BENITEZ told the patrol officer that he had just sold several vehicles and was on his way to the bank to deposit the money. He said he ran the light because he was nervous having that much money in the vehicle with him. During a search of the vehicle after it was impounded, a large amount of U.S. currency was found in five sealed plastic bundles inside a large shopping bag, with a red logo, that was on the rear floorboard of the vehicle. A review of the electronic surveillance monitoring of ROMERO's residence disclosed that she left her residence with the same bag that was subsequently seized.

85. At approximately 7:39 p.m., ISAIS-CABRERA received an incoming call on Target Telephone 415-336-9156 from ROMERO, who was using telephone number 818-720-0132. During the conversation, ROMERO told ISAIS-CABRERA that the guy she met this afternoon got caught. ROMERO went on to tell ISAIS-CABRERA that the guy she met was stopped, made to sign some papers and let go. ROMERO told ISAIS-CABRERA that the guy she met called her and accused her of being followed at her house and having her telephone tapped. ROMERO assured ISAIS-CABRERA that she did not meet the guy by her house but met him at the Target. At the conclusion of


the conversation, ISAIS-CABRERA told ROMERO that he was going to call EL TOCAYO the next day. ISAIS-CABRERA told ROMERO to drive around and go through some alley ways and the like to see if she saw anything strange.

86. At approximately 9:15 p.m., ISAIS-CABRERA received an incoming call on Target Telephone 415-336-9156 from TONO, who was calling from Mexico. During the conversation, TONO told ISAIS-CABRERA that the old man was pissed off and he was saying that the lady must have set the kid up. TONO then told ISAIS-CABRERA that the old man was saying that the kid only went to pick "that" up and the way things turned out, the lady must have set him up. Later in the conversation, TONO told ISAIS-CABRERA that the man was angry because it was his son and he (the man) said his son was not involved in anything. ISAIS-CABRERA asked TONO if they found "it" on him and TONO affirmed. ISAIS-CABRERA told TONO to check to see if they could get the money back. TONO told ISAIS-CABRERA that he (the kid) told them that the money was for a truck or something. TONO added that he would get a better idea of what happened as soon as the kid got back. TONO concluded the conversation by telling ISAIS-CABRERA that he would call him tomorrow.

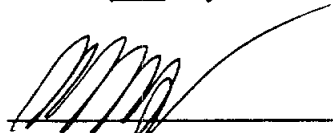
87. Based on the forgoing facts, I believe that there is probable cause to conclude that on February 8, 2005, JOSE ISAIS-CABRERA transported proceeds from the sales of illegal narcotics from the San Francisco Bay Area to SILVIA ROMERO in Pacoima, California. Additionally, a portion of the proceeds transported by ISAIS-CABRERA on February 8, 2005, was seized by law enforcement on February 16, 2005. Furthermore, based on conversation between ISAIS-CABRERA and TONO, the proceeds were destined for an unidentified individual (referred to only as "the man"

and "the old man" in intercepted conversations) in Mexico.

88. Based upon the foregoing facts, I believe that there is probable cause to conclude that from September 2, 2004 through the present, JOSE ISAIS-CABRERA, knowingly conspired with LUPE, C. AGUAYO, SILVIA ROMERO, PATRICIA SERRANO, LUIS ELVIR, ROBERTO MORENO, RENE HERNANDEZ, OMAR QUINTERO CORNELIO, AIDE SEGURA GARCIA, VERENICE VALENCIA PENA, and others to possess with intent to distribute and to distribute a Schedule I controlled substance, to wit: 5 kilograms or more, but not more than 15 kilograms, of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II). MONEY LAUNDERING,


MELANIE ADAMS
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn to before
me this 18 day of February, 2005


MARIA-ELENA JAMES
United States Magistrate Judge

Appendix A
Wire Remittance through VIGO

Date Processed	SENDER NAME	RECEIVER NAME	PIN	Net Amount
11/5/2004	CARLOS MORFIN GARCIA	PATRICIA MADRIGAL LUA	11885578086	\$ 2,450.00
11/5/2004	RIGOBERTO AGUIRRE ACEBEDO	ANA MARIA ALVAREZ ISAIS	11885578094	\$ 2,500.00
11/24/2004	GABRIEL ALANIS	RICARDO RAMIREZ RODRIGUEZ	11460893583	\$ 2,800.00
11/24/2004	JOSE ISRAEL DIAZ NUNEZ	ROSA ELVIA GRACIAN GARCIA	11616274300	\$ 2,800.00
11/24/2004	ROSALVA CHAVARRIA SOLIS	OSCAR GARCIA TINOCO	11627480375	\$ 2,800.00
12/1/2004	JOSE H ARIAS ORTIZ	EDGARDO BETANCOURT	11887306122	\$ 2,100.00
12/1/2004	FRANCISCO J GOMEZ	PATRICIA MADRIGAL LUA	11887311726	\$ 2,600.00
12/1/2004	JUAN H DIAZ JUAREZ	CELIA TORRES TORRES	11887311734	\$ 2,600.00
12/29/2004	VICTOR MENDOZA FARIAS	RAMON MARTINEZ MARTINEZ	11889837660	\$ 2,500.00
12/29/2004	PEDRO PEREZ GONZALEZ	JOSE ANTONIO MARTINEZ RAZO	11889838361	\$ 2,500.00
12/30/2004	LUIS G PARDO HERNANDEZ	ANTONIO MORALES CATALAN	11889906598	\$ 2,500.00
1/4/2005	ISIDRO CORTES ROBLES	GILBERTO CONTRERAS RAMIREZ	11890360207	\$ 2,500.00
1/4/2005	RODRIGO ESTRADA DIAZ	PROSPERA FUENTES ALARCON	11890360223	\$ 2,675.00
1/4/2005	ROSALVA CHAVARRIA SOLIS	MARIA DE JESUS ALVAREZ CHAVEZ	11890360215	\$ 2,700.00
1/4/2005	COSME FERNANDEZ PACHECO	JAIME VAZQUEZ RAMIREZ	11890395781	\$ 2,700.00
1/4/2005	ALFREDO CISNEROS GUTIERRES	RAQUEL ISAIS CABRERA	11890385063	\$ 2,600.00
1/4/2005	ABEL CORONA MEDEROS	ANA MARIA ALVAREZ ISAIS	11890374778	\$ 2,650.00
1/4/2005	ANTONIO PIZA JACOBO	EDGARDO BETANCOURT	11890362997	\$ 2,700.00
1/4/2005	ADRIAN AGUAYO RUANO	MAGDALENA BERBER TAMAYO	11890360256	\$ 2,625.00
1/4/2005	JOSE AGUSTIN TELLEZ CORONA	ANTONIO LOPEZ GARCIA	11890360231	\$ 2,700.00
1/4/2005	JOSE ANTONIO VALENCIA	MARIA ELENA VIRRUETA BARAJAS	11890360249	\$ 2,600.00
1/13/2005	GILBERTO DIAZ LEAL	OLIVIA ALMAZAN ARCOS	11890857020	\$ 2,525.00
1/13/2005	TOMAS SANCHEZ PINEDA	JOSE MANUEL ARCOS CASTORENA	11890857012	\$ 2,525.00
1/19/2005	ANTONIO PIZA JACOBO	RAMON MARTINEZ MARTINEZ	11891401745	\$ 2,400.00
1/19/2005	JUAN A ARROYO ARREDONDO	JOSE ANTONIO MARTINEZ RAZO	11891403022	\$ 2,600.00

Appendix A
Wire Remittance through VIGO

Date Processed	SENDER NAME	RECEIVER NAME	PIN	Net Amount
Total Wire Remittance through VIGO				\$ 64,650.00